



August 24, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: Ex parte filing in WC Docket Nos. 10-90, 14-58, 07-135 and CC Docket No. 01-92

Dear Ms. Dortch:

On August 8, 2018, Jeff Smith and the undersigned of GVNW Consulting, Inc. (GVNW), met telephonically with Steven Rosenberg of the Wireline Competition Bureau.

The *ex parte* meeting was about aspects of the 100 percent competitive process that could be improved. We suggested clarifying that when a study area is identified as being 100 percent overlapped in the Commission's Public Notice based on the FCC Form 477, if the unsubsidized voice and broadband competitor(s) cited as the overlapping party does not file supporting data in the initial comment round of the proceeding, no further action need to be taken by the incumbent and the lack of the filing of such data shall automatically trigger a final determination by the Commission that the tentatively identified 100 percent overlap is null and void for the purpose of that proceeding. We also requested that if the unsubsidized voice and broadband provider(s) does file in the initial comment round, the incumbent must have a sufficient time to develop sufficient and reliable data to rebut any assertions made. Finally, we discussed a modification to the FCC Form 477 that would help clarify whether all census blocks listed as served by the unsubsidized voice and broadband competitor had less than 100 percent of the locations in each census block served.

As required by the Commission's rules, this *ex parte* record is now filed in the above referenced dockets. If there are any questions, please call me on 301-738-0020.

Respectfully submitted,

Via ECFS 8/24/2018

David B. Cohen, Esq.
Senior Policy Advisor
GVNW Consulting, Inc.

Copy to:

Steven Rosenberg, FCC